



## Office of Information Technology

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October 26, 2007

662 South President  
P.O. Box 2338  
Jackson, Mississippi 39225-2338  
Office: 601-960-8835 Fax: 601-960-8860

Letter of Appeal  
FCC, Office of Secretary  
445 12<sup>th</sup> Street SW  
Washington, DC 20544

**RE: CC Docket No. 02-6 - 471 Application 517351 FRN 1425733 “Request for Review” and  
“Request for Waiver”**

To Whom It May Concern:

On August 14, 2007 Jackson Public Schools sent an appeal to the SLD in regards to **471 application 517351, FRN 1425733**. During a recent visit from USAC’s HATS Team, we asked HATS about any outstanding issues which needed to be addressed. The HATS Team discovered that we had already used two (2) years of the 2-in-5 rule for internal connections. It was determined that we inadvertently identified the category as “Internal Connections.” It should have been identified as “Basic Maintenance of Internal Connections,” as we were applying for Basic Maintenance of our district routers and switches.

We were advised by the HATS Team to call the Ombudsman’s office, whereby Prabha Madhavan, Assistant Ombudsman of USAC, advised us to submit an appeal to the SLD citing the clerical error and asking that the correction be made.

The appeal was denied on August 29, 2007 on the merits of filing the appeal outside of the 60 day receipt of the approved FCDL. Citing the Bishop Perry Order, we feel that the error was a ministerial one, and it was not the intention of the district to utilize an additional year of Internal Connections. It was in fact our intention to mark the application as Basic Maintenance of Internal Connections.

It is of note that during both the PIA and SRIR review processes, that this error was not discovered.

It is also of note that the application of Basic Maintenance of Internal Connections was a new option for the 2005-2006 school year, and had yet to become common practice for us during the application process.



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We are requesting both a review of the recent denial, and a waiver of the 60 day rule to appeal based on the FCDL.

We are also requesting that the identified **FRN 1425733** be changed to Basic Maintenance of Internal Connections, as well as the reinstatement of our Internal Connection year.

Please know that we were denied funding for a wireless project that was to be deployed to all elementary schools for the 2007-2008 school year, which included FRNs 1624665, 1626051, and 1625900 for a total of \$2,013,601.64 in funding. The loss of the 2-in5 year will also cause a denial of a proposed wireless network and video codec installation at all middle and high schools for the 2008-2009 school year, unless this issue can be resolved.

Your assistance in this matter is greatly appreciated.

Sincerely,

Gavin Guynes  
Director, ITS  
Jackson Public Schools